

-17-

REMARKS

This amendment is responsive to the Office Action mailed on November 11, 2004. In view of the claims amendments and remarks herein, Applicants respectfully request reconsideration.

Claim 1-2, 6, 9-16, 19 and 22-45 are now pending in this Application. Claims 1-2, 6, 9-16, 19 and 22-45 stand rejected. Claim 9 has been canceled in view of the amendments below. Claims 1, 14, 27, 29, 31 33 and 42 are independent claims and the remaining claims are dependent claims. In this Amendment, claims 1, 6, 14, 19, 27, 29, 31, 38, 42, 44 and 45 been amended. Applicant(s) believe that the claims as presented are in condition for allowance. A notice to this affect is respectfully requested.

The Office Action rejects claim 44 under 35 U.S.C. § 112 as failing to comply with enablement. "Case-Logic," as disclosed in the specification as filed at page 27, lines 1-4, describes operations employed by the web navigation application to interpret the primitive constructs and determine what web navigation commands, URL, or other information should be included in the text-based request. The term refers to selection from a number of alternatives based on a value or range match, and is commonly implemented as a "CASE" or "MATCH" statement in stack based computer languages such as C++, and is commonly known in the art. Nonetheless, Applicant has herein amended claim 44 to recite case match, to clarify the claimed usage of the term. Further, claims 6 and 19 also employ the term "case-logic" and have been amended accordingly. Therefore, it is respectfully requested that the rejection under 35 U.S.C. § 112 be withdrawn.

The Office Action rejects Claims 1, 2, 6, 9-16, 16 and 22-45 under 35 U.S.C. § 103(a) as being obvious based on Cohen et al. (U.S. Publication No. 2002/0164000, '164 hereinafter) in view of Saylor et al., U.S. Patent No. 6,501,832 ('832). Cohen '164, however, does not teach or suggest, alone or in combination, the presently claimed invention because Cohen discloses a voice to voice system operable according to embedded "audiolinks" for navigating "voice

enabled” web pages ([0021],[0023]) In contrast, the exemplary embodiment of the claimed invention employs tagged documents operable to generate audible output (a second set of information) based on a first set of information such as a web page.

In further detail, the cited Cohen ‘164 system employs a browser for navigating among web pages which are audio-enabled and voice-enabled, configured according to a user specific profile [0030]. The present claim 1, however, recites a system for generating a second set of information (i.e. audible web page output) from a first set of information and the tagged document. In support of the rejection, the Examiner cites paragraphs 0011 and 0012 of Cohen. Cohen, however, discloses generating output including such audio enabled web pages and links to further pages. Nowhere in Cohen ‘164 is shown or disclosed such output including a second set of information (i.e. audible web page output) from a first set of information and the tagged document. Such a second set of information may be, for example, text data suitable for audible output via a text to speech application, as described at page 9, lines 10-17.

The Office Action further acknowledges that Cohen ‘124 does not disclose a tagged document, but also cites Saylor ‘832 as disclosing such a document. Applicant respectfully disagrees with this conclusion. The cited sections of Saylor ‘832 disclose a voice-XML document “or other voice XML file format” (18:56-57). The claimed tagged document is an application defining document 307 associated with a filtering document page 302 (page 27:12-16). Such an application defining document is distinguishable from the cited Saylor documents because the application defining document 307 includes media content and control information, as described at page 23, lines 15-16. The application defining document 307 is operable to provide a menu structure responsive to user input for accessing and applying to the filtering document 302, as discussed at page 24, lines 2-9.

For these reasons, claim 1 is believed to be distinguishable over Cohen. However, to further clarify distinguishing features recited in applicant’s claims,

and to facilitate the claims of the present invention to allowance, claim 1 has been amended with the subject matter of claim 9, which codifies these distinctions by reciting that the step of generating the second set of information suitable for audio output comprises selecting at least one portion of the first set of information that is suitable for audio output; and generating the second set of information based on selecting the at least one portion of the first set of information and the tagged document, therefore clarifying that the generation of the second set of information employs the tagged document for selecting a portion of the first set of information (i.e. filtering) for filtering “information that is suitable for audio output” in the second set of information. Therefore, applicant has herein amended claim 1 with the subject matter of claim 9 to further clarify that the claimed tagged document is the application defining document operable to apply the filtering document 302 to the first set of information (i.e. web page) and generate the second set of information (output audio), as described at page 25, lines 11-25, and further at page 26, lines 7-10 and Fig. 6.

The Office Action further suggests that the subject matter of claim 9 is suggested by Cohen ‘164 at [0035]. Paragraph [0035], however, discusses audiolinks, which, as indicated above, are custom pointers to other web pages, such as the specialized voice-enabled web pages required by Cohen [0021]. As discussed at page 27, lines 5-28, the claimed generation of the second set of information from the first set of information involves filtering specified by the tagged document, not pointer link references to other web pages as in Saylor. Further, as the Office Action concedes, Cohen does not teach or suggest such a tagged document (page 4, paragraph 3 of the Office Action). As indicated above, the voiceXML pages cited in Saylor do not teach or suggest the claimed tagged document. Further, one of skill in the art would not look to Saylor ‘832 to modify Cohen because Saylor is concerned with creating voice pages and associating voice codes to such voice pages, and does not teach or suggest, alone or in combination, the audiolink based system of Cohen ‘164 which purports to provide

audiolinks among voice enabled web pages similar to hyperlinks in conventional HTML web pages [0021].

Paragraph [0035] of Cohen, therefore, teaches audible identifiers played to a user as a prompt to traverse the corresponding link denoted by the identifier, described as a so-called "earcon" by Cohen. The "earcons" appear to emulate an audio version of an underlined text identifier to a related web page in conventional browsers, also known as a so-called "hotlink." In contrast, the subject matter of claim 9 performs selecting, or filtering of a conventional web page (the first set of information) for identifying salient information requested by the user (534, 536, Fig. 8) , and playing the corresponding audio information by applying a text to speech operation (540, Fig., 8). For example, the stock quotes example of Fig. 8 illustrates searching a web page for a stock ticker symbol (536), providing filtering of the web page for the salient content. Next, the text-to-speech string (\$ttsstr) is constructed and played back at 540. The earcon markers (e.g. "<", ">") of the cited paragraph 0035 merely identify, with an audible signal, a custom audiolink which a user may elect to follow or not follow by reciting the "earconed" term (e.g. "Apple," "Ibm," etc.).

Claims 38 and 40, also rejected under Cohen [0035], further clarify this distinction by reciting that the tagged documents may include a plurality of filtering documents, and that (in claim 40), the tagged documents include at least one filtering document, as in Fig. 8. Paragraph [0035] in no way teaches or suggests the claimed filtering according to a tagged document, as the above discussion clarifies.

Further, even if one were to combine the voice codes of Saylor '832 with Cohen '164, the presently claimed invention would still not be realized because the present claims include a first set of information used to generate the second set of information from a portion thereof via a web navigation application operable for various types of web-transportable data, not just voice data, as discussed at page 22, line 24-page 23 line 3.

Independent claims 14, 27, 29, 31 are of similar scope to claim 1, and have also been amended with the subject matter of claim 9. Accordingly, these claims are also deemed allowable per the above remarks, and it is respectfully requested that the Examiner reconsider the rejection in view of these remarks and amendments.

Further, claims 33 and 42 currently recite generating an audio output file, rather than a second set of information as in claims 14, 27, 29 and 32, and claims the retrieved web page rather than a first information set, but are otherwise of similar scope. Accordingly, claims 33 and 42 have been similarly amended to recite that generating the audio output file further comprises selecting at least one portion of the retrieved web page that is suitable for audio output; and generating the audio output file based on selecting the at least one portion of the first set of information, and is therefore believed to now be allowable.

The Office Action further rejects claim 2 based on the abstract and paragraphs [0011-0012] of Cohen. Claim 2, however, further distinguishes the presently claimed invention by reciting that the first set of information is a web page based on a Uniform Resource Locator (URL) request for the web page, the tagged document comprises accessing an Extensible Markup Language (XML) document that the second set of information includes filtered web content suitable for audio output based on the web page and the XML document. Accordingly, claim 2 is certainly distinguishable from the Cohen '164 system which operates on specialized voice-enabled web pages and voicelinks associated with such pages. As recited above, the Cohen system requires such specialize voice enabled web pages, not simply an general HTML web page, and further that the voicelinks are operable with the specialized voice web pages. Further, the combination of Saylor with Cohen does not teach or suggest the present claim 2 because the Vcodes and associated Vpages taught by Saylor are inapplicable because Saylor is concerned with an exclusively voice system, and does not contemplate general HTML web pages. Accordingly, it is

-22-

respectfully submitted that claim 2 is allowable. Further, claims 15, 28, 30 and 32 are of a similar scope and are therefore submitted as also being allowable.

Further, claim 45 has been herein amended to depend from claims 43 and 42. Accordingly, claim 45 now recites a user specific user identifier number indicative of an LDAP resource having personal data and an intermediary proxy browser operable to generate signals which the user audio communication device converts to audible sound, features neither shown nor disclosed in Cohen '164 or Saylor '832, alone or in combination, to clarify and distinguish particular features of applicant's invention. No teaching or suggestion of an LDAP lookup of a personal identifier is shown or disclosed in paragraph [0011] of Cohen, as the Office Action suggests. No teaching or suggestion of an intermediate proxy browser for supporting a text to speech conversion is shown or disclosed in paragraph [0022], as alluded to in the Office Action. Accordingly, it is respectfully submitted that amended claim 45 is allowable over the cited art of record.

As the remaining claims depend, either directly or indirectly from claims 1, 14, 27, 29, 31 33 and 42, which by the foregoing remarks and amendments are respectfully submitted as being allowable, all claims in the case are therefore submitted as now being in condition for allowance.

Applicant(s) hereby petition(s) for any extension of time which is required to maintain the pendency of this case. If there is a fee occasioned by this response, including an extension fee, that is not covered by an enclosed check, please charge any deficiency to Deposit Account No. 50-0901.

-23-

If the enclosed papers or fees are considered incomplete, the Patent Office is respectfully requested to contact the undersigned collect at (508) 366-9600, in Westborough, Massachusetts.

Respectfully submitted,



Christopher J. Lutz, Esq.
Attorney for Applicant(s)
Registration No.: 44,883
CHAPIN & HUANG, L.L.C.
Westborough Office Park
1700 West Park Drive
Westborough, Massachusetts 01581
Telephone: (508) 366-9600
Facsimile: (508) 616-9805
Customer No.: 022468

Attorney Docket No.: CIS00-2410

Dated: March 7, 2005